ILLINOIS ENVIRONMENTAL PROTECTION AGENCY MEMORANDUM

DATE: March 10, 1983

TO: All Members of the Site Clean-Up Technical Panel

FROM: William H. Busch WHB

SUBJECT: Tara Corporation/St. Louis Lead Recyclers - Fugitives Control Program
119040ABJ 119040ADL

At our meeting on March 9, 1983 members received an outline of issues to be addressed by the Panel. We had an update on operations at both Tara and St. Louis Lead. Tom Bierma, Sherry Otto and Monte Nienkerk discussed air emission, soil and ground water sample results.

The immediate concern for our technical panel is what needs to be done to minimize further air borne toxic materials from leaving storage, handling and processing areas of both Tara and St. Louis Lead Recyclers. Based on the data presented on air and soil samples fugitive emissions pose an immediate threat to the community and pose long-term deposition contamination of area soils. Soil samples indicate that substantial contamination has occurred in the area over the many years of operation at a lead smelter (previously owned by others) at this facility.

The fugitive problem is likely to be present from this facility even if present operations by Tara and St. Louis Lead Recyclers are suspended due to wind action over highly contaminated soils and the large scrap pile. Fugitive emissions, however, are substantially greater with handling, transport and processing going on at these two companies.

With a good fugitive dust control program combined with close day-to-day operational control to assure implementation, lead-bearing dust can be substantially suppressed in the operation of the existing two compounds.

For discussion purposes, I recommend the panel consider and expand on the following program. This program is aimed at the issued outlined in the attached outline; issues 1 a through f and issue 5(1).

1. All roads (paved or unpaved) on the plant sites of both companies should have dust control practicer applied immediately. This may include:

   a) Sprinkling with water as necessary to dampen (not soak) surfaces to supress dust.

   b) Consider use of chemical dust supressants like calcium chloride.

2. All plant traffic should be confined only to marked roadways or surfaces properly treated for dust control. No trucks should travel open areas not so marked and treated.

3. Unpaved roads should be paved as soon as conditions permit with at least a hot-sprayed bitumimous coating typed with fine agregate; A-1 or A-2 motor fuel tax speeds. (Include Truck Tread Area)

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4. Trucks used to handle any row or finished products should be guaranted to the plant site.

5. All open areas not essential for traffic or parking should be seeded and vegetated with a suitable cover crop immediately.

6. All material handling loading, unloading, shaking, etc. operations should utilize effective dust control measures such as low-volume, fine water mist dampening procedures to prevent dust emissions. This includes working of the pile. Traffic areas on top of the pile should receive water spray dampening with a sprinkler truck as used on other plant roadways.

7. All public access to the property must be controlled with suitable fencing and appropriate warning signs.

8. St. Louis Lead should be allowed to continue to operate only if:

   a) The dust control practices outlined in the Final Agency recommendation is implemented.

   b) All air emissions from the process are in compliance with appropriate DAPC permits.

   c) They either find a market for the scrap hard rubber pile which is accumulating on their property within a specified deadline; or make arrangements to return the scrap hard rubber to the large pile on TARA's property after the specified deadline.

   d) The existing hard rubber storage area is prepared to prevent surface runoff (bermed) and a bedding of crushed limestone is laid down under any new material to be placed to prevent lead movement down into soils under the pile.

   e) Hard rubber waste is suitably washed prior to storage.

   f) Hard rubber waste is treated with an agent to bring lead leaching to within ~~EO~~ EP toxicity test limits.

The long term issues in this case remain to be addressed:

1. Soil contamination by lead and other pollutants off the plant site.

2. Ultimate disposition of waste material on the site.

3. Groundwater and deep soil contamination.

4. Costs.

I would like to have some volunteers for a sub committee on estimating costs of removal of the entire pile of battery components and other material on the TARA site.

cc: Roger Kanerva
Joe Podlewski
Bob Sharma